UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF WEST VIRGINIA AT CHARLESTON

IN RE: ETHICON, INC., PELVIC REPAIR SYSTEM PRODUCTS LIABILITY LITIGATION

Master File No. 2:12-MD-02327 MDL No. 2327

THIS DOCUMENT RELATES TO THE CASES ON THE EXHIBIT ATTACHED HERETO

JOSEPH R. GOODWIN U.S. DISTRICT JUDGE

JOINT MOTION TO DISMISS WITH PREJUDICE

Plaintiffs, whose cases are listed on the attached Exhibit A, and Defendants, Johnson & Johnson, Inc., Ethicon, Inc., and/or Ethicon LLC (collectively, the "Ethicon Defendants"), jointly move the court to dismiss with prejudice these actions and all claims against the Ethicon Defendants which were, or could have been asserted, pursuant to Fed. R. Civ. P. 41(a)(1)(A)(ii). Each party shall bear her or its own costs.

Respectfully submitted,

/s/ Marilyn T. McGoldrick
Marilyn T. McGoldrick
THORNTON LAW FIRM
100 Summer Street, 30th Floor
Boston, MA 02110
617-720-1333
mmcgoldrick@tenlaw.com
Counsel for Plaintiffs

/s/ William M. Gage
William M. Gage (MS Bar #8691)
Butler Snow LLP
1020 Highland Colony Parkway
Suite 1400 (39157)
P.O. Box 6010
Ridgeland, MS 39158-6010
(601) 985-4561
william.gage@butlersnow.com

/s/ Susan M. Robinson
Susan M. Robinson (W. Va. Bar #5169)
Thomas Combs & Spann PLLC
300 Summers Street
Suite 1380 (25301)
P.O. Box 3824
Charleston, WV 24338

(304) 414-1800 srobinson@tcspllc.com

Counsel for the Ethicon Defendants

EXHIBIT A

2:14-cv-14392	Andrade v. Ethicon
2:14-cv-21310	Maltacea v. Ethicon
2:16-cv-01443	Scanlon v. Ethicon
2:16-cv-01811	Escobar v. Ethicon
2:16-cv-03211	Scieszinski v. Ethicon

CERTIFICATE OF SERVICE

I certify that on this date I electronically filed this document with the clerk of the court using the CM/ECF system, which will send notification of this filing to CM/ECF participants registered to receive service in this MDL.

/s/ William M. Gage